Rainier Commons Temporary Waste Storage Facility

Standard operating Procedure (SOP) Process Controls

Purpose:

During the course of the exterior paint abatement project for Rainier Commons, it is anticipated that up to three types of regulated waste may be generated:

1. A bulk mixture of removed paint and blasting media
2. Exposed containment structure material, PPE, and non-liquid cleaning materials, and
3. Liquid wastes generated during the abatement process

This Standard Operating Procedure (SOP) describes the temporary storage facility, marking requirements, and periodic inspection requirements used to ensure these waste products are protected starting from their initial *removed from service* dates until the waste containers are loaded for shipment to their final disposal site.

Background:

Temporary storage of regulated wastes generated during Individual Phase Work Plan Phase One (IPWP I) and Individual Phase Work Plan IIa (IPWP IIa) was accomplished by utilizing vacant on-site warehouse space in Building 15, lower level.

Subsequent to the completion of these Phases, Building 15 has been leased to commercial tenants, eliminating the building as a temporary storage facility for future Phases. All other units with direct forklift access are also leased. An enclosed storage area is available in Building 6, on the 400 level. This unit will be designated as the Rainier Commons Temporary Waste Storage Facility (Storage Facility) for the remainder of the abatement project.

The Rainier Commons site is registered with the EPA. Site ID Number WAD051239994.

References:

40 CFR 761.65 Storage for Disposal

40 CFR 761.40 Marking Requirements

40 CFR 761.45 Marking Formats

Facility Construction:

Building 6-400 is of concrete and structural steel construction. The unit contains no windows and is protected by a water-proof roof to prevent exposure to the elements. No floor drains have been installed in the concrete slab floor. Three man-doors and a freight elevator provide access to the unit. All man-doors are bolted closed from inside the unit. Access via the freight elevator is controlled by a lockable garage door inside the unit (pictures attached).

Eight-inch diameter straw waddles will be installed and maintained under two layers of sealed, 6-mil rip-stop polyethylene sheeting to provide a continuous curbed storage area capable of containing 25% of the total volume of all PCB containers stored within.

Stored containers shall be either sealed 55-gallon drums or one-cubic yard "super-sacks" meeting DOT approved design requirements. The exterior of all waste containers will be decontaminated by HAZWOPER-trained abatement personnel prior to transportation to the Storage Facility.

Incoming containers will be transported via forklift to the loading dock located at the west entrance to Building 9-100. Building 9-100 is currently occupied by a commercial art studio, separated from the public lobby by a solid demising wall. From the loading dock, the containers will be moved utilizing a standard pallet jack, through the Building 9 lobby, onto the freight elevator. The freight elevator will then provide access to Building 6-400 (see attached floor plan).

Janitorial service, which may include hepa vacuum, damp dusting or mopping will follow each round of delivery in the Building 9-100 lobby and in the freight elevator and will follow each shipment of waste to storage site in the Building 6-400 area and all building egress areas.

All material handling will be performed by HAZWOPER-trained personnel.

The facility is selected and designed to meet the requirements of 40 CFR 761.65 (b)(1).

Marking:

Once a waste container has been sealed, decontaminated, and moved from the abatement work area, each container will be clearly tagged with a label meeting the requirements of 40 CFR 761.45 (example attached) on two sides of the container.

Each container entering the storage facility shall be assigned a unique identification number consisting of the container's Set-Up number, a unique Alpha identifier (A, B, C, etc.), and its accumulation start date (e.g. the second container from Set-Up #26, received for storage on January 17, 2020 will have an identification number of 26-B-1-17-20). A running tally of containers arriving for storage, including their I.D. number, shall be maintained at the storage facility entrance. This record shall be used to determine when a container is nearing its required shipment date. This tally sheet shall also record each container's actual shipment date and manifest number.

Additionally, a form meeting the requirements of the Washington State Department of Ecology (Ecology), identifying the type of hazard, accumulation start date, and the major risk will be affixed to the front of the container (example attached).

A label meeting the requirements of 40 CFR 761.45 will also be displayed at every entrance to the Temporary Storage Facility, as required by 40 CFR 761.40.

Periodic Inspections:

To ensure that containers stored in the Storage Facility pose no risk to human health or the environment, a weekly inspection by a HAZWOPER-trained person will be conducted. The inspection will consist of applicable elements listed on the Ecology checklist titled *Weekly Inspection Checklist for Dangerous Waste Container Accumulation Area* (copy attached). Completion of the weekly inspection will be documented on the Checklist, which will be retained for five years.

State PCB Waste Storage and Disposal Regulations:

Reference: *Differences Between Washington State and Federal Rules — Highlights* Revised October 2010

All PCB waste to be stored, transported, and disposed of in accordance with all applicable State regulations, in addition to Federal regulations.

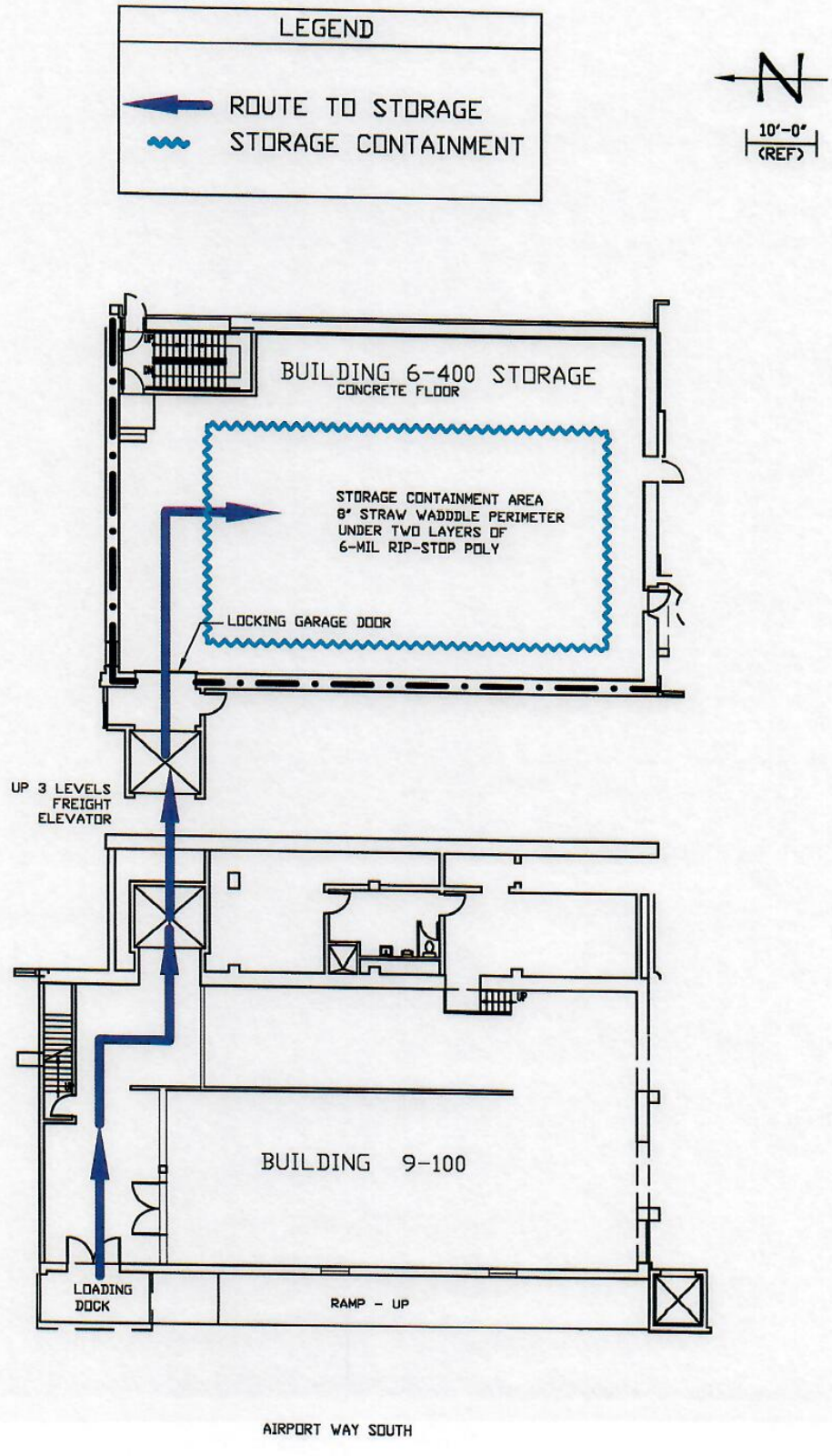
All waste generated from the work shall be transported for final disposal within 90 days of each container's Out of Service date.

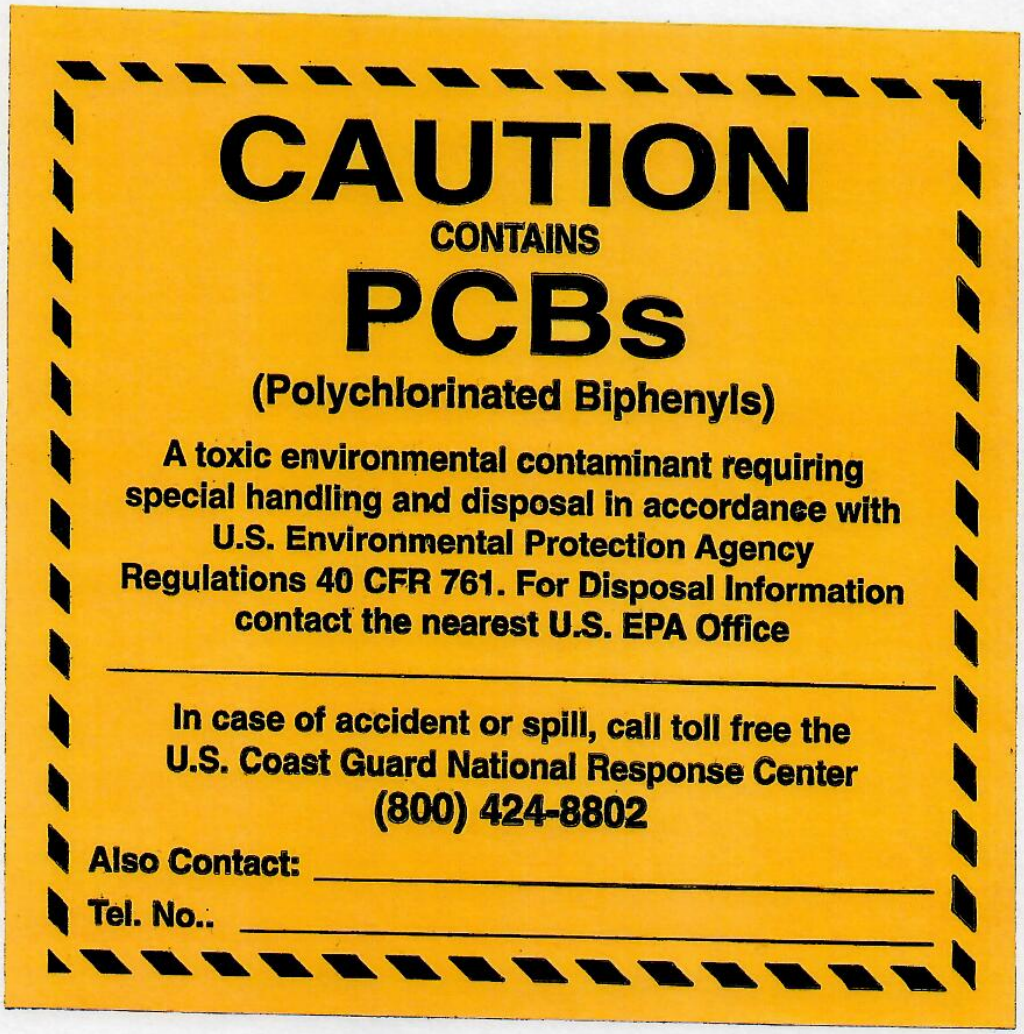
TEMPORARY WASTE STORAGE FACILITY
BUILDING 6, 400 LEVEL

TEMPORARY WASTE STORAGE FACILITY

BUILDING 6, 400 LEVEL

ACCESS VIA BUILDING 9 ELEVATOR




CAUTION
CONTAINS
PCBs
(Polychlorinated Biphenyls)
A toxic environmental contaminant requiring special handling and disposal in accordance with U.S. Environmental Protection Agency Regulations 40 CFR 761. For Disposal Information contact the nearest U.S. EPA Office
In case of accident or spill, call toll free the U.S. Coast Guard National Response Center
(800) 424-8802
Also Contact:
Tel. No..

HAZARDOUS WASTE

ACCUMULATION START DATE:

_____

TOXIC

DEPARTMENT OF ECOLOGY
State of Washington

Weekly Inspection Checklist
for Dangerous Waste Container Accumulation Area

For the Month of _____, _____

Mark answers Yes or No below

Week 1	Week 2	Week 3	Week 4	Week 5		Date	Time	Inspector's Printed Name AND Signature
					Week 1	/ /		
					Week 2	/ /		
					Week 3	/ /		
					Week 4	/ /		
					Week 5	/ /		

					Are all drums and containers marked or labeled as hazardous waste (or "waste pending analysis")?
					Are all drums and containers marked with the risk associated with the waste?
					Are all containers (excluding satellite containers) marked with the accumulation start date?
					Are any drums near or exceeding the LQG 90-day or MQG 180-day timeframe?
					Are all drum labels visible and readable?
					Are all containers closed?
					Are all drums and containers in good condition?
					Are any drums leaking?
					Is there 30 inches of aisle space between rows of containers?

Containment

					Is the secondary containment free of cracks or other failures?
					Are sumps clean and free of contamination, spills, leaks, and standing water?

Safety Equipment

This section is not required for weekly inspections but will meet some of the general facility inspection requirements.

					Are fire extinguishers charged?
					Are spill kits stocked?
					Is the first aid cabinet stocked?
					Is the emergency shower and eye wash station functioning properly?
					Are the emergency communication devices operating properly?
					Is emergency response information posted near all communication devices? **(MQG only)**

Comments: Describe the actions taken to correct each deficiency noted above, and note date each action was taken.

Reference Washington Dangerous Waste Regulations, Chapter 173-303 WAC for further information, specifically, WAC 173-303-200(1)(b) and by reference 630(6).

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